

3

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

CURTIS WENZLAFF,

Defendant.

Case: 4:19-cr-20147
Judge: Leitman, Matthew F.
MJ: Davis, Stephanie Dawkins
Filed: 03-18-2019
INFO USA v. CURTIS WENZLAFF (dw)

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

18 U.S.C. §545; Attempted Smuggling of Goods into the United States

On or about July 14, 2014, in the Eastern District of Michigan and elsewhere, CURTIS WENZLAFF, did willfully and knowingly and with intent to defraud the United States, attempt to smuggle and clandestinely introduce into the United States merchandise contrary to law, by making out or passing or attempting to pass said merchandise through the custom-house by means of a false and fraudulent invoice, declaration and letter, in violation of Title 18, United States Code, Section 545.

FORFEITURE ALLEGATION

The allegations contained in Count One of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. §§ 982(a)(2)(B) and 545 and 28 U.S.C. § 2461(c).

Upon conviction of the offense alleged in Count One of this Information, defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the smuggling offense, and, pursuant to 18 U.S.C. §545 and 28 U.S.C. §2461(c), any merchandise introduced into the United States in violation of §545, or the value thereof.

If any of the property described above, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. §853(p), incorporated by 18 U.S.C. §982(b) and 28 U.S.C. §2461(c).

Dated: March 18, 2019

MATTHEW SCHNEIDER
United States Attorney

s/NANCY A. ABRAHAM
Assistant United States Attorney
600 Church Street
Flint, MI 48502
(810) 766-5177

s/ANTHONY P. VANCE
Assistant United States Attorney
Chief, Branch Offices

(Companion Case information MUST be completed by AUSA and initialed.)

United States District Court
Eastern District of Michigan**Criminal Case Cover**Case: 4:19-cr-20147
Judge: Leitman, Matthew F.
MJ: Davis, Stephanie Dawkins
Filed: 03-18-2019
INFO USA v. CURTIS WENZLAFF (dw)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials: NAA

Case Title: USA v. CURTIS WENZLAFF**County where offense occurred :** GENESEE AND ELSEWHERE**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

 Indictment/ X Information --- **no** prior complaint.
 Indictment/ Information --- based upon prior complaint [Case number: 19-mj-30013]
 Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information**Superseding to Case No:** _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (if applicable)****Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**March 18, 2019

Date

s/NANCY A. ABRAHAM
Assistant United States Attorney
600 Church Street
Flint, MI 48502
Phone: 810-766-5177
Fax: 810-766-5427
Attorney Bar # P42060

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.